

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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William Krieger,	:	
	:	
Plaintiff,	:	Civil Action No. 4:16-CV-00830
	:	
v.	:	Matthew W. Brann
	:	United States District Judge
Bank of America, N.A.,	:	
	:	
Defendant.	:	
	:	

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**BANK OF AMERICA, N.A.'S MOTION TO DISMISS  
PLAINTIFF'S AMENDED COMPLAINT**

Bank of America, N.A. (“Bank of America” or “Defendant”) respectfully moves this Court, pursuant to Fed. R. Civ. P. 12(b)(6), to dismiss the Amended Complaint of Plaintiff William Krieger (“Plaintiff”) with prejudice for the reasons set forth in the accompanying Memorandum of Law.

Respectfully Submitted,

s/Robert E. Warring  
Robert E. Warring  
Attorney I.D. No. 209326  
REED SMITH LLP  
Three Logan Square  
1717 Arch Street  
Philadelphia, PA 19103  
215-851-8100

*Attorneys for Defendant  
Bank of America, N.A.*

Dated: June 20, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of June, 2016, I caused a true and correct copy of the foregoing Motion to Dismiss Plaintiff's Amended Complaint to be served via ECF upon the following:

Brett Freeman, Esquire  
Sabatini Law Firm, LLC  
216 N. Blakely Street  
Dunmore, PA 18512

s/Robert E. Warring  
Robert E. Warring